

LOL-HECO-IR-56

Ref: "Q. Do you agree with the conclusions in the study regarding the need for and objectives of the East Oahu Transmission Project? A. Yes." (HECO Exhibit T-3, page 21, lines 12-14; & Expert Qualifications of HECO Witness Randy Pollock, HECO-300)

Question(s):

- a. Over the course of your career, how many utility operations have you analyzed?
- b. How many times did you find that the approach by the utility was incorrect?
- c. How many of those analyses did you find that the utility had done something significantly wrong?
- d. Please provide copies of the three reports you wrote that are the strongest cases for the fact that you can look at your employer from an objective viewpoint.

HECO Response:

- a. It is not possible to determine the exact number of utility operations that Mr. Pollock has analyzed over the last 32 years, since many of the records no longer exist. As noted in his resume (HECO-300), while employed by Pacific Power & Light Company from 1972 through 1981, a large part of his responsibility was completing electrical system planning studies for all of the distribution systems in Southern Oregon, Northern California and Central Wyoming. During that period of time, he evaluated well over 200 systems, and many of the systems multiple times over a period of years. From 1981 until the present, while employed by Power Engineers, he has been responsible for the analysis of over 20 utility operations for power systems throughout the United States. In some cases, the systems were studied multiple times over a period of many years. These studies have included analysis of systems of various sizes and a wide range of voltage levels, including 138kV, as is used on Oahu.
- b. Providing recommendations is a normal part of the work performed by Mr. Pollock for his

clients. These recommendations may or may not agree with the clients' ideas of how best to approach the situation under study. However, these recommendations are based on the results of technical analysis interpreted with engineering judgment. Upon discussion, apparent differences in approach are usually reconciled through sharing of information and the results of analysis, and an explanation of the engineering judgment used to arrive at the recommendations. Even if differences remain, finding that a utility is incorrect in its approach doesn't typically occur, because there is almost always more than one reasonable approach to solving a problem or completing a study. As explained in Mr. Pollock's testimony beginning on page 4 (HECO T-3), there are many issues to be addressed when conducting planning studies, and due to the complexity of electric systems and the multiple options normally available to resolve a potential problem, there is typically more than one valid approach. In no cases has Mr. Pollock worked with a client that was not intent on basing the study effort on industry standards, approved planning criteria, and codes then in effect. In some cases, areas of study that were recommended for further investigation were identified. In virtually all cases, the client has carefully considered the recommendations and subsequently, further analysis or discussions were completed to resolve the issue. Occasionally, it is found that data has been incorrectly entered into a database, or not updated recently, but that would not be considered "significant" in the context of the overall study effort, but rather simply a part of checking of the work.

- c. Please see response to subpart b. above.
- d. Please refer to the documents produced as part of Mr. Pollock's response to LOL-HECO-IR-55.